



January 07, 2005

FEB 14 2005

Office of Nutritional Products
Labeling and Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

Pursuant to the requirements of Section 6 of the Dietary Supplement Health and Education Act of 1994, 21 U.S.C. 343 r (6) and in accordance with the authorized provisions of 21CFR 101.93, AdvoCare provides notification for statements on dietary supplement labels as follows:

The name and address of the manufacturer, packer or distributor of the dietary supplement that bears the statements:

AdvoCare International, L.P.
2727 Realty Road, Suite 134
Carrollton, TX 75006

Product Name: KickStart ImmunoBurst
Statement(s)

Basis for Statement

Supports a healthy immune system

Schisandra extract (fruit - Schisandra chinensis)
Echinacea extract (aerial - Echinacea purpurea)
Licorice extract (root - Glycyrrhiza glabra)
Spikenard extract (root and rhizome - Aralia
mandshurica)
Vitamin C (as ascorbic acid)

Helps the body adapt to stress

Schisandra extract (fruit - Schisandra chinensis)
Echinacea extract (aerial - Echinacea purpurea)
Licorice extract (root - Glycyrrhiza glabra)
Spikenard extract (root and rhizome - Aralia
mandshurica)
Vitamin C (as ascorbic acid)

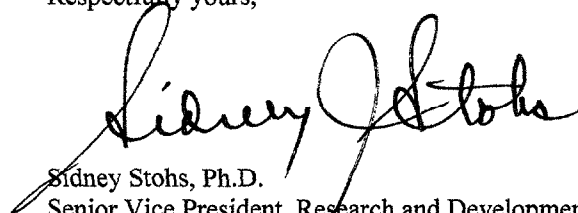
Has antioxidant activity

Schisandra extract (fruit - Schisandra chinensis)
Echinacea extract (aerial - Echinacea purpurea)
Licorice extract (root - Glycyrrhiza glabra)
Vitamin C (as ascorbic acid)

Certification

The undersigned certifies that the information contained in this notice is complete and accurate and that AdvoCare International, L.P. has substantiation that the statements are truthful and not misleading.

Respectfully yours,


Sidney Stohs, Ph.D.
Senior Vice President, Research and Development
AdvoCare International, L.P.

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2727 Realty Road, Carrollton, TX 75006